

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA §  
§  
VS. § CRIMINAL 4:23-CR-413  
§  
§ JUDGE KEITH P ELLISON  
ABIGAIL JO SHRY §

**UNOPPOSED MOTION TO CONTINUE SENTENCING HEARING AND RELATED**

**DEADLINES**

COMES NOW the Defendant, ABIGAIL JO SHRY, by and through undersigned counsel, and respectfully moves the Court to continue the sentencing hearing currently set for August 7th, 2025 for at least 60 days. In support of this request, counsel would show as follows:

Counsel for Ms. Shry is requesting additional time to gather mitigation information and prepare for sentencing.

Accordingly, Defendant respectfully requests that sentencing be continued for at least sixty (60) days to allow counsel to adequately prepare and ensure effective representation.

WHEREFORE, Defendant respectfully requests that the Court grant this motion and reset sentencing for a date no sooner than sixty (60) days from the current setting.

Respectfully submitted,

/s/ Brandon G. Leonard  
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Attorney for Defendant,  
ABIGAIL JO SHRY

**CERTIFICATE OF CONFERENCE**

I certify that I conferred with Assistant United States Attorney Richard Hanes regarding the 60 day extension and he confirmed that he was unopposed.

/s/ Brandon Leonard